

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

CAROLINE PATTON GRIFFIN,  
Individually and as Surviving Spouse and  
Executor of the Estate of  
LEE DIXON GRIFFIN, JR.,

Plaintiff,

vs.

TOYOTA MOTOR CORPORATION;  
TOYOTA MOTOR NORTH AMERICA,  
INC.; TOYOTA MOTOR SALES U.S.A.,  
INC.; TOYOTA MOTOR ENGINEERING  
& MANUFACTURING NORTH  
AMERICA, INC.; TOYOTA MOTOR  
MANUFACTURING, TEXAS, INC.; and  
JIM ELLIS AUTOMOTIVE HOLDINGS,  
INC.,

Defendants.

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CIVIL ACTION FILE

NO. 1:23-CV-03107-TWT

**PLAINTIFF'S RESPONSE TO**  
**JIM ELLIS AUTOMOTIVE HOLDINGS, INC.'S MOTION FOR**  
**SUMMARY JUDGMENT**

Plaintiff hereby notifies the Court that she does not oppose defendant Jim Ellis Automotive Holdings, Inc.'s Motion for Summary Judgment. ECF 7.

Counsel for Jim Ellis authorizes Plaintiff to represent that Jim Ellis will not seek costs, fees, or any other expenses of litigation.

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/s/ Ramsey B. Prather

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in Times New Roman, 14 point font.

BY: /s/ Ramsey B. Prather

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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This 10th day of August, 2023.

BUTLER PRATHER LLP

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